

AUG 12 2021

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville**AFFIDAVIT**

1. I, Brandon A. Glover, being duly sworn, state the following information to be true to the best of my knowledge, information and belief:

I. INTRODUCTION

2. This affidavit is made in support of an application to search a blue, 2002 Dodge Caravan, vehicle identification number ("VIN") 2B8GP74L12R535527, bearing Florida license plate number IU0-0TR affixed to the rear of the vehicle, registered to Jennifer Joyce Stein of Fort Myers, Florida, with damage to rear lift gate (driver's side) and a circular "Fire Dept." sticker affixed to the lower, passenger side portion of the rear lift gate, which is currently in possession of the Knoxville Police Department (KPD), and stored at the KPD Forensics office, located at or near 913 East Fifth Avenue, Knoxville, Tennessee 37917. Further description and photographs of the vehicle are attached hereto as Attachment A and are fully incorporated herein.

II. AGENT BACKGROUND AND EXPERIENCE

3. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and have been so employed since March 2015. I am currently assigned to the Knoxville Field Office of the FBI. I was assigned to the Appalachia High Intensity Drug Trafficking Area (HIDTA) Task Force for approximately four years. My primary duties and responsibilities as a FBI HIDTA TFO involved the investigation of violations of federal law including the Controlled Substances Act as found in Title 21 of the United States Code. Currently, I am assigned as a TFO with the FBI Knoxville Safe Streets Task Force (SSTF). I am a sworn police officer for the City of Knoxville, Tennessee, and have been so employed since October 18, 2004. I am currently an Investigator with the Knoxville Police Department's (KPD) Organized Crime Unit (OCU) and have served in this capacity since approximately 2012. During my tenure as a FBI Task Force Officer and KPD Police Officer and Investigator, I have investigated numerous crimes including, but not limited to, illegal narcotics trafficking, prescription drug fraud and forgery, gangs and organized crime, money laundering, burglary, kidnapping, fugitive violations, bank robbery, carjacking, and weapons violations. My primary duties as a Task Force Officer with the FBI include investigating crimes occurring in the Eastern District of Tennessee.

4. More specifically, I have conducted physical surveillance, executed search warrants, analyzed phone and internet records, and arrested criminal suspects. I have also interviewed confidential human sources, suspects, defendants, witnesses, and other experienced investigators concerning the methods and practices of the criminal element.

5. During the course of my employment as an FBI Task Force Officer, I have participated in numerous investigations of robberies, kidnappings, and carjackings. I have also participated in investigations involving the use of federal search warrants to collect evidence, including DNA evidence. Through these investigations, my training and experience, and conversations with

other agents and law enforcement personnel, I have become familiar with the importance of human DNA and fingerprint evidence and how such evidence can assist law enforcement with identification of criminal suspects.

6. Except as noted, all of the information contained in this affidavit is either known to me personally or has been told to me by other law enforcement officials. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, I have set forth only those facts necessary to establish probable cause, and have not included each and every fact known to me in this investigation.

III. APPLICABLE LAW

7. Based on my training, experience, and the facts as set forth in this Affidavit, I believe there is probable cause that contraband, evidence, fruits, and instrumentalities related to violations of Title 18 U.S.C. § 1201 – Kidnapping, Title 18 U.S.C. § 2119 – Carjacking, and Title 18 U.S.C. § 924c – Possession of a firearm during and in relation to a crime of violence.

IV. PROBABLE CAUSE

8. On August 4, 2021, at approximately 6:40 p.m., a lone white male, hereinafter referred to as “SUBJECT”, entered the victim’s silver, 2013 Volvo XC60 sport utility vehicle, bearing Georgia license plate RXV-2817, in the parking lot of Planet Fitness located at 4570 Chapman Highway, Knoxville, Tennessee 37920. The twenty year old female victim, whose identity is known to law enforcement, was sitting in the driver’s seat of the aforementioned silver, 2013 Volvo XC60 sport utility vehicle, looking at her cellular telephone, when the SUBJECT broke the front passenger door window glass, and pointed a black handgun at her.

9. The SUBJECT opened the front passenger door of the victim’s vehicle, and sat down in the front passenger seat. The SUBJECT told the victim that his car is out of gas, and demanded that the victim take him “up the hill”. The SUBJECT then told the victim that he will kill her if she does not comply with his demands.

10. The victim drove her vehicle from the parking lot located at 4570 Chapman Highway and turned right (northbound) onto Chapman Highway. The SUBJECT then demanded that the victim make a right turn onto Woodlawn Pike. During the car ride, the SUBJECT asked the victim several questions. The SUBJECT asked the victim where she planned to go after she left the gym. The victim told the SUBJECT that she had planned to drive home. The SUBJECT then asked the victim if anyone else lived at her residence. The victim then advised the SUBJECT that she lived at home with her parents. After several minutes, the victim and SUBJECT arrived at the four-way intersection near SoKno Taco, 3701 Sevierville Pike, Knoxville, Tennessee 37920. SoKno Taco is located at the southeast corner of the intersection of Lancaster Drive and Sevierville Pike in Knoxville, Tennessee.

11. The victim stopped her vehicle at the intersection, which is controlled by a stop sign. While her vehicle is still in the roadway, the victim exited her silver, 2013 Volvo XC60 sport utility vehicle, and fled on foot toward the direction of SoKno Taco. During her escape from the

vehicle, the SUBJECT grabbed the victim's right arm in an attempt to keep her inside of the vehicle.

12. After fleeing to SoKno Taco, the victim summoned help from one of the SoKno Taco employees. The SoKno Taco employee, whose identity is known to law enforcement, called 911 and requested a police response to his employer's address.

13. The SoKno Taco employee told Knoxville Police Department officers that he heard the victim scream for help. Additionally, the SoKno Taco employee told officers that he observed the SUBJECT get into the driver's seat of the victim's silver, 2013 Volvo XC60, and proceed north on Sevier Avenue.

14. Knoxville Police Department patrol officers responded to SoKno Taco, 3701 Sevierville Pike, Knoxville, Tennessee 37920 to make contact with the victim. The victim was transported to the Violent Crimes Unit (VCU) office of the Knoxville Police Department and was subsequently interviewed by Investigator Andrew Markham.

15. During her interview with Investigator Markham, the victim described the SUBJECT as a white male with a large build, in his late forties to fifties in age, with tan skin, large hands, and dark-colored or black and gray hair. The victim told Investigator Markham that the SUBJECT had a distinct "widow's peak" hairline. The SUBJECT was wearing dirty blue jeans, a light-colored flannel shirt with a white tank top shirt underneath, blue-mirrored sunglasses, and a thick, silver, chain necklace. According to the victim, the SUBJECT was armed with a black handgun. The victim informed Investigator Markham that the SUBJECT had a cut on his nose, which was bleeding. The victim recalled that the SUBJECT kept wiping blood from the exterior of his nose. The victim reported that the SUBJECT spoke with a "southern accent". The victim consented to a search of her vehicle when/if it was located by law enforcement

16. When the victim fled from her vehicle near the intersection of Lancaster Drive and Sevierville Pike, she left several of her belongings in the vehicle to include her brown purse and her Apple iPhone 11.

17. Shortly after the incident, a stationary camera, which records the license plates of vehicles traveling on Highway 11E (Asheville Highway) toward Jefferson County, captured an image of the passenger side and rear of the victim's vehicle. The stationary camera also captured an image of the license plate affixed to the rear of the victim's silver, 2013 Volvo XC60 – RXV-2817 (Georgia).

18. On August 4, 2021, at approximately 7:59 p.m., a Jefferson County Sheriff's Office (JCSO) dispatcher contacted Knox County Emergency Communications (E-911) to inform the agency that JCSO deputies had located the victim's silver, 2013 Volvo XC60 on Highway 11E at Whitaker Road. Upon their arrival at the scene, deputies discovered that the victim's vehicle was unoccupied; however, it was still "in drive". Deputies observed that the two front doors of the victim's vehicle were open. JCSO deputies observed several spent shell casings underneath the rear of the victim's vehicle.

19. Investigator Markham and other KPD VCU investigators responded to the reported location of the victim's vehicle on Whitaker Road at Highway 11E. JCSO deputies informed

Investigator Markham that, prior to law enforcement officers' arrival on the scene, New Market resident Timothy Elkins and his fiancé were traveling on Whitaker Road when they noticed a male subject "slumped over" the steering wheel of the victim's vehicle.

20. Timothy Elkins, concerned for the occupant of the victim's vehicle, stopped and rolled down his window to check on the occupant's welfare. The occupant, believed to be the SUBJECT, then exited the victim's vehicle, and approached Timothy Elkins pickup truck. The SUBJECT, who was armed with a handgun, grabbed the rear passenger door handle. Timothy Elkins then proceeded to drive away. The SUBJECT attempted to jump into the bed of the pickup truck, but was unsuccessful. As he drove away from the SUBJECT, Timothy Elkins heard a series of gunshots.

21. Investigator Markham and KPD Crime Lab Technician Amy Gill conducted a search of the victim's vehicle. A green and black nicotine vaporizer device was located and recovered by Technician Gill from the driver's floorboard. Additionally, Technician Gill swabbed several interior surfaces of the victim's vehicle for the presence of DNA. Technician Gill also swabbed the green and black nicotine vaporizer device for the presence of DNA. After the completion of the search, Chestnut Street Wrecker Service was summoned to the scene to tow the vehicle to the City's (Knoxville) Vehicle Impoundment Lot. While the victim's silver, 2013 Volvo XC60 was being loaded onto the wrecker, Investigator Markham observed what appeared to be a bullet defect in the gas tank located underneath the victim's vehicle.

22. On August 5, 2021, at approximately 9:59 a.m., the victim went to the City's Vehicle Impoundment Lot to recover her silver, 2013 Volvo XC60 sport utility vehicle. Upon opening the front passenger door of her vehicle, the victim noticed a silver chain necklace and a single automobile ignition key on a metal ring located on the floorboard between the passenger seat and passenger door. Upon discovering the silver, chain necklace, and key, the victim contacted Investigator Markham to inform him of her discovery. The victim told Investigator Markham that the two items she discovered did not belong to her. Investigator Markham contacted KPD dispatch to request a KPD Crime Lab technician respond to the City's Impoundment Lot to photograph the items and confiscate them as evidence.

23. On August 5, 2021 at approximately 5:00 p.m., Investigator Markham met KPD Crime Lab Technician Brooke Grunenwald to retain the automobile ignition key that was previously recovered from the victim's vehicle. After taking possession of the automobile ignition key, Investigator Markham examined it. Based on Investigator Markham's training and experience, he determined that the automobile ignition key recovered from the victim's vehicle was an "aftermarket" key likely used to start a Chrysler brand automobile (Chrysler, Dodge, Jeep, Ram).

24. Based on the fact that the SUBJECT was likely in possession of another vehicle prior to forcing entry into the victim's vehicle, KPD officers canvassed the parking lot of the Planet Fitness, 4570 Chapman Highway, Knoxville, Tennessee 37920, for a Chrysler brand automobile that may have been abandoned. KPD Officer Adam Parnell located a blue, 2002 Dodge Caravan, bearing Florida license plate number IU0-0TR in the Planet Fitness parking lot. After locating the vehicle, Officer Parnell contacted Investigator Markham. Investigator Markham responded to the parking lot of Planet Fitness with the automobile ignition key that was previously discovered inside of the victim's vehicle. Investigator Markham inserted the key into the front passenger door of the aforementioned blue, 2002 Dodge Caravan, bearing Florida

license plate number IU0-0TR. Investigator Markham discovered that the key actuated the door lock mechanism of the vehicle. Investigator Markham inserted the automobile ignition key into the rear lift gate and front driver's door of the blue, 2002 Dodge Caravan. The key successfully actuated the locks of the rear lift gate and front driver's door of the blue, 2002 Dodge Caravan.

25. KPD Officer Parnell requested that a wrecker respond to the scene to tow the vehicle from the parking lot of Planet Fitness. While awaiting the arrival of a tow truck, Investigator Markham spoke to the manager of Planet Fitness. The manager of Planet Fitness, whose identity is known to law enforcement, allows Investigator Markham to view previously recorded video surveillance camera footage that captured activity in the parking lot where the blue, 2002 Dodge Caravan was recovered. Upon reviewing the video surveillance footage, Investigator Markham determined that the blue, 2002 Dodge Caravan entered the Planet Fitness parking lot at 5:30 p.m. on August 4, 2021. The driver/occupant of the blue, 2002 Dodge Caravan exited from the driver's seat at 6:30 p.m. on August 4, 2021. After exiting the driver's seat of the blue, 2002 Dodge Caravan, the driver/occupant returns to the vehicle. Additionally, the driver/occupant who exited the blue, 2002 Dodge Caravan, appears to resemble the general description of the SUBJECT. The blue, 2002 Dodge Caravan, vehicle identification number ("VIN") 2B8GP74L12R535527, bearing Florida license plate number IU0-0TR, was towed from the parking lot to the KPD Forensics office, located at or near 913 East Fifth Avenue, Knoxville, Tennessee 37917, by Floyd's Wrecker Service.

26. KPD Officer Parnell requested that a KPD NCIC Operator query the Florida license plate (IU0-0TR) affixed to the rear lift gate of the blue, 2002 Dodge Caravan for the purpose of identifying the registered owner of the vehicle. The registered owner of the vehicle is a female named Jennifer Joyce Stein. Jennifer Joyce Stein resides at 1707 Woodward Avenue, North Fort Myers, Florida 33903. Officer Parnell then asked a dispatcher send a teletype to the Lee County Sheriff's Office requesting that a deputy make contact with Jennifer Joyce Stein at the aforementioned address.

27. On August 5, 2021 at approximately 6:56 p.m., Lee County Sheriff's Office (LCSO) Deputy Daniel Gray made contact with Jennifer Joyce Stein at her residence, 1707 Woodward Avenue, North Fort Myers, Florida 33903. According to Deputy Gray, Jennifer Joyce Stein owns the blue, 2002 Dodge Caravan. Deputy Gray informed KPD Officer Parnell that Jennifer Joyce Stein has not seen her blue, 2002 Dodge Caravan in several weeks. Jennifer Joyce Stein advised Deputy Gray that her brother, a white male named Aaron Bradley Stein (date of birth (DOB) 10/18/1985) drove her blue, 2002 Dodge Caravan to Tennessee to look for property.

V.

CONCLUSION

26. Based on the foregoing, I believe there is probable cause to search the blue, 2002 Dodge Caravan, vehicle identification number ("VIN") 2B8GP74L12R535527, bearing Florida license plate number IU0-0TR, which is currently in possession of the Knoxville Police Department (KPD), and stored at the KPD Forensics office, located at or near 913 East Fifth Avenue, Knoxville, Tennessee 37917, for evidence of a crime; contraband, fruits of crime, or other items illegally possessed; property designed for use, intended for use, or used in committing a crime, as described in Attachment B, which is attached hereto and fully incorporated herein, in violation of Title 18 U.S.C. § 1201 – Kidnapping, Title 18 U.S.C. § 2119 – Carjacking, and Title 18 U.S.C. § 924c – Possession of a firearm during and in relation to a crime of violence.

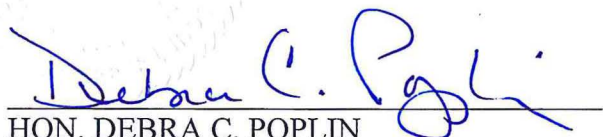
FURTHER AFFIANT SAYETH NAUGHT.

Executed this 6TH day of August, 2021,
at Knoxville, Tennessee.



Brandon A. Glover
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me on this 6TH day of August, 2021.



HON. DEBRA C. POPLIN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

A blue, 2002 Dodge Caravan, vehicle identification number (“VIN”) 2B8GP74L12R535527, bearing Florida license plate number IU0-0TR affixed to the rear of the vehicle, registered to Jennifer Joyce Stein of Fort Myers, Florida, with damage to rear lift gate (driver’s side) and a circular “Fire Dept.” sticker affixed to the lower, passenger side portion of the rear lift gate, which is currently in possession of the Knoxville Police Department (“KPD”), and stored at the KPD Forensics office, located at or near 913 East Fifth Avenue, Knoxville, Tennessee 37917.





ATTACHMENT B

Items to be seized:

Evidence of the federal criminal offenses of Title 18 U.S.C. § 1201 – Kidnapping, Title 18 U.S.C. § 2119 – Carjacking, and Title 18 U.S.C. § 924c – Possession of a firearm during and in relation to a crime of violence, including:

- 1) Clothing, personal hygiene products, food and/or drink waste/containers/wrappers likely to contain human DNA;
- 2) Cellular telephones, tablets, laptop computers, GPS devices;
- 3) Firearms, ammunition, and other dangerous weapons;
- 4) Bill of sales, financial statements, identification cards, or any documents that would lead towards the identity of occupants and/or operators of the vehicle